REMARKS

This amendment is responsive to the Office Action dated March 3, 2005. Applicants have amended claims 1, 4, 9-17, 19, 23-31 and 33, and cancelled claims 3, 20 and 41. Claims 1, 2, 4-19, 21-40 and 42 are pending.

Claim Rejections Under 35 U.S.C. § 103

In the Office Action, the Examiner: (1) rejected claims 1, 5-10, 13, 16-19, 23, 24, 27, 30-33, 35, 40 and 42 under 35 U.S.C. § 103(a) as being unpatentable over USPN 6,449,658 to Lafe et al. (Lafe) in view of USPN 6,728,785 to Jungck (Jungck); (2) rejected claims 2 and 39 under 35 U.S.C. § 103(a) as being unpatentable over Lafe, in view of Jungck, and in further view of USPN 6,311,223 to Bodin et al. (Bodin); (3) rejected claims 3, 4, 20 and 41 under 35 U.S.C. § 103(a) as being unpatentable over Lafe, in view of Jungck, and in further view of USPN 6,438,125 to Brothers (Brothers); (4) rejected claims 11, 12, 25, 26, 34 and 36 under 35 U.S.C. § 103(a) as unpatentable over Lafe, in view of Jungck, and in further view of USPN 6,424,981 to Isaac et al. (Isaac); (5) rejected claims 14, 15, 28, 29, 37 and 38 under 35 U.S.C. § 103(a) as being unpatentable over Lafe, in view of Jungck, and in further view of USPN 6,546,388 to Edlund et al. (Edlund); and (6) rejected claims 21 and 22 under 35 U.S.C. § 103(a) as being unpatentable over Lafe, in view of Jungck, and in further view of USPN 6,557,005 to Burget (Burget).

Applicants respectfully traverse the rejections to the extent such rejections may be considered applicable to the claims as amended. The applied references fail to disclose or suggest the inventions defined by Applicants' claims, and provide no teaching that would have suggested the desirability of modification to arrive at the claimed invention.

For example, the applied references fail to disclose or suggest transmitting original web page source data to a remote client after transmitting modified web page source data to the remote client, as required by independent claim 1, as amended. Similarly, the applied references fail to disclose or suggest a server-side networking device comprising a controller configured to transmit original web page source data to a remote client after transmitting modified web page source data to the remote client, or a server-side acceleration device configured to send an original, unmodified version of web page source data to a remote client after sending modified

web page source data to the remote client, as respectively required by independent claims 19 and 33, as amended.

In the Office Action, the Examiner argued that Brothers teaches this requirement of the amended independent claims. More particularly, the Examiner argued that "Brothers teaches after transmitting a modified web page to the remote client, transmitting the original web page source data to the remote client for the purpose of flexibly viewing web pages."[1] Applicants respectfully suggest that the Examiner appears to have misunderstood the Brothers disclosure.

Contrary to the Examiner's argument, Brothers does not disclose or suggest transmitting original web page source data to a remote client after transmitting modified web page source data to the remote client. Indeed, Brothers does not provide any teaching relating to modification of web page source data, much less this requirement of Applicants' independent claims. Instead, Brothers teaches temporarily substituting a completely different replacement web page for the web page requested by client, e.g., temporarily redirecting the user to an advertisement prior to sending the requested web page.[2] This teaching would not have even remotely suggested transmitting original web page source data to a remote client after transmitting modified web page source data to the remote client to one of ordinary skill art. Further, none of the other applied references provides any teaching that would have suggested this requirement of Applicants' independent claims to one of ordinary skill in the art.

Applicants also disagree with the Examiner's characterization of the Lafe reference with respect to the requirements of Applicants' independent claims. In particular, contrary to the Examiner's arguments, Lafe fails to disclose or suggest filtering at least a portion of non-renderable character data from original web page source data, thereby creating modified web page source data, as required by independent claims 1, 19 and 33. Lafe provides no teaching indicating an appreciation of a difference between renderable and non-renderable character data, and no teaching relating to filtering web page source data to create modified web page source data. Instead, Lafe merely teaches compressing and decompressing web page data by a server and client, respectively.[3] Compression and decompression as taught by Lafe would not have

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[1] Office Action, page 6.
[2] *See, e.g.,* Brothers, Abstract and col. 1, ln. 51 – col. 2, ln. 46.
[3] *See, e.g.,* Lafe, Abstract and col. 2, ll. 49-54.

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even suggested filtering web page source data to one of ordinary skill, much less specifically filtering non-renderable character data, as required by Applicant's independent claims.

As another example, the applied references fail to teach or suggest filtering tags of web page source data by rewriting tags of the web page source data in lower case, or an acceleration device configured to filter tags be rewriting the tags of the web page source data in lower case, as respectively required by claims 2 and 39. In the Office Action, the Examiner argued that it would have been obvious for one of ordinary skill to modify the system described by Lafe to include rewriting tags in lowercase as per the teachings of Bodin. However, Bodin does not teach rewriting tags in lowercase. Instead, Bodin teaches "tokenizing" tags.

More particularly, Bodin teaches that tags are tokenized at a server by replacing each of the tags with a smaller token that is associated with the tag in a lookup table, and detokenized at a client, using the lookup table, by replacing the smaller token with the original tag.[4] The example lookup table included in column 6 of Bodin indicates that some tokens may include lowercase letters. However, this appears to merely illustrate replacement of lowercase tags with tokenized versions (i.e. shorter versions) that are also lower case. Consequently, this teaching would not have suggested rewriting tags from uppercase to lowercase, or an acceleration device configured to rewrite tags from uppercase to lowercase, to one of ordinary skill in the art.

As another example, the applied references fail to disclose or suggest filtering whitespace from original web page source data to create modified web page source data, as required by claim 12, as amended. Similarly, the applied references fail to teach or suggest a controller or acceleration device configured to filter white space from original web page source data to create modified web page source data, as respectively required by amended claim 26 and claim 34. Additionally, the applied references fail to disclose or suggest an acceleration device configured to filter hard returns from original web page source data to create modified web page source data, as required by claim 36.

Indeed, with respect to each of claims 9-16, 23-30 and 34-38, the Examiner's arguments that it is known that web page source data includes the various items recited in those claims, such as whitespace, are insufficient to establish a prima facie case of obviousness. Each of these claims as presently presented requires <u>filtering</u> of the recited items. The mere knowledge that

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[4] Bodin, col. 5, ln. 31 – col. 6, ln. 55.

such items exist in web page source data would not have been sufficient to motivate a person of ordinary skill to modify the Lafe system to actually _filter_ such items, particularly in the absence of any teaching in Lafe of filtering, as discussed above. Consequently, absent some teaching in the prior art of filtering the recited items, the Examiner cannot establish a prima facie case of obviousness for these claims.

For at least these reasons, the Examiner has failed to establish a prima facie case for non-patentability of Applicant's claims 1, 2, 4-19, 21-40 and 42 under 35 U.S.C. 103(a). Withdrawal of these rejections is requested.

CONCLUSION

All claims in this application are in condition for allowance. Applicant respectfully requests reconsideration and prompt allowance of all pending claims. Please charge any additional fees or credit any overpayment to deposit account number 50-1778. The Examiner is invited to telephone the below-signed attorney to discuss this application.

Date:

By:

September 6, 2005

SHUMAKER & SIEFFERT, P.A.
8425 Seasons Parkway, Suite 105
St. Paul, Minnesota 55125
Telephone: 651.735.1100
Facsimile: 651.735.1102

Name: Kent J. Sieffert
Reg. No.: 41,312